

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNIFORMED FIRE OFFICERS  
ASSOCIATION, et al.,

*Plaintiffs,*

-v.-

DE BLASIO, et al.,

*Defendants.*

Case No. 20-cv-05441 (KPF)

**DECLARATION OF  
RUSSELL M. SQUIRE**

I, RUSSELL M. SQUIRE, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I am a duly licensed member of the New York bar and an attorney with the law firm of Covington & Burling LLP. I represent *amicus curiae* Justice Committee Inc. in this matter and am admitted to practice in the District Court for the Southern District of New York. I submit this declaration in opposition to Plaintiff's Motion for a Preliminary Injunction. This declaration is based on personal knowledge and my review of the attached documents.

2. Attached as Exhibit A is a true and correct copy of the following news article: Matt Flegenheimer & Wendy Ruderman, *Shot by Officer After Car Crash, Woman Dies*, N.Y. TIMES (June 14, 2012), <https://www.nytimes.com/2012/06/15/nyregion/woman-shot-by-police-in-brooklyn-after-car-crash.html?partner=rss&emc=rss>.

3. Attached as Exhibit B is a true and correct copy of the ProPublica database entry of the Civilian Complaint Review Board findings for Detective Phillip Atkins. PROPUBLICA,

<https://projects.propublica.org/nypd-ccrb/officer/18605-phillip-atkins> (last visited Aug. 11, 2020).

4. Attached as Exhibit C is a true and correct copy of Carimah Townes, *Exclusive Documents: Officer had an 'unusual' number of complaints before he killed Ramarley Graham*, THINK PROGRESS (Mar. 28, 2017), <https://archive.thinkprogress.org/richard-haste-disciplinary-record-474f77eb8d19/>.

5. Attached as Exhibit D is a true and correct copy of J. David Goodman, *Anger in East Flatbush Persists Over Teenager's Killing by the Police*, N.Y. TIMES (Mar. 13, 2013), <https://www.nytimes.com/2013/03/14/nyregion/teenager-killed-by-new-york-police-was-shot-7-times.html>.

6. Attached as Exhibit E is a true and correct copy of John Marzulli, *Both cops involved in shooting of Kimani Gray, 16, in East Flatbush named in federal lawsuits*, N.Y. DAILY NEWS (Mar. 15, 2013), <https://www.nydailynews.com/new-york/brooklyn/cops-killed-kimani-gray-named-federal-lawsuits-article-1.1290342>.

7. Attached as Exhibit F is a true and correct copy of the ProPublica database entry of the Civilian Complaint Review Board findings for Sergeant Mourad Mourad. PROPUBLICA, <https://projects.propublica.org/nypd-ccrb/officer/23282-mourad-mourad> (last visited Aug. 12, 2020).

8. Attached as Exhibit G is a true and correct copy of the ProPublica database entry of the Civilian Complaint Review Board findings for Detective Jovaniel Cordova. PROPUBLICA, <https://projects.propublica.org/nypd-ccrb/officer/35868-jovaniel-cordova> (last visited Aug. 12, 2020).

9. Attached as Exhibit H is a true and correct copy of the following news article:

*Timeline of key events in Eric Garner chokehold death*, ASSOCIATED PRESS (July 16, 2019)

<https://apnews.com/ec7ac5a664d74cdab852d639c0da08f4>.

10. Attached as Exhibit I is a true and correct copy of the following news article:

Carimah Townes & Jack Jenkins, *Exclusive Documents: The disturbing secret history of the NYPD officer who killed Eric Garner*, THINK PROGRESS (Mar. 21, 2017),

<https://archive.thinkprogress.org/daniel-pantaleo-records-75833e6168f3/>.

11. Attached as Exhibit J is a true and correct copy of the following news article:

Ross Keith, Ben Kochman, & Thomas Tracy, *N.Y. Attorney General probes video of Delrawn Small being shot by off-duty cop within seconds of approaching officer's car*, N.Y. DAILY NEWS (July 8, 2016), <https://www.nydailynews.com/new-york/nyc-crime/ag-probes-video-victim-delrawn-small-punching-off-duty-cop-article-1.2704876>.

12. Attached as Exhibit K is a true and correct copy of the following news article:

Benjamin Weiser, *Former Officer Gets 7 1/2 Years In Man's Death*, N.Y. TIMES (Oct. 9, 1998), <https://www.nytimes.com/1998/10/09/nyregion/former-officer-gets-7-1-2-years-in-man-s-death.html>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York this 14th day of August 2020.

/s/ Russell M. Squire  
Russell M. Squire